

1 BROCK K. OHLSON, ESQ.  
Nevada Bar No. 12262  
2 JUSTIN A. CORNE, ESQ.  
Nevada Bar No. 14504  
3 CAITLIN J. LORELLI, ESQ.  
Nevada Bar No. 14571  
4 **BROCK K. OHLSON PLLC**  
5 6060 Elton Avenue  
Las Vegas, Nevada 89107  
6 (702) 982-0055 Phone  
7 (702) 982-0150 Fax  
E-Mail: EFILE@INJURED.VEGAS  
8 *Attorneys for Plaintiff*

9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

12 BIANCA LANG-BLACK, an individual;

13 Plaintiff,

14 vs.

15 AAA LIFE INSURANCE COMPANY, a  
16 foreign corporation; AND DOES I through V,  
17 and ROE CORPORATIONS I through V,  
inclusive,

18 Defendants.  
19

CASE NO.: 2:23-cv-00117-GMN-DJA

**STIPULATION AND PROPOSED  
ORDER TO EXTEND DEADLINE TO  
SUBMIT JOINT PRETRIAL ORDER**

20  
21 The Parties by and through their counsel of record hereby stipulate extend the deadline to submit  
22 the joint pretrial order pursuant to LR 16-3 and LR 16-4 which is presently due September 18,  
23 2024.

24 This brief extension is necessary due to current trial schedules and a family emergency  
25 requiring Plaintiff's counsel to be out of office. The parties will work diligently together to prepare

a comprehensive Joint Pretrial Order and the instant request is brought in good faith. The parties respectfully request a one-month extension in an abundance of caution, making the Joint Pretrial Order due Friday, October 18, 2024.

**IT IS SO STIPULATED**

<p>Dated: September 18, 2024</p> <p>By: <u>/s/ Caitlin Lorelli</u>  Caitlin J. Lorelli, Esq.  Nevada Bar No. 14571  BROCK K. OHLSON PLLC  6060 Elton Avenue  Las Vegas, Nevada 89107  (702) 982-0055 Phone  (702) 982-0150 Fax  E-Mail: EFILE@INJURED.VEGAS  Attorneys for Plaintiff</p>	<p>Dated: September 18, 2024</p> <p>By: <u>/s/ Emily Felix</u>  Paul R. Hejmanowski, Esq. (NSB #94)  Charles H. McCrea, Esq. (NSB #104)  PRHLAWLLC  520 South Fourth Street, Suite 360  Las Vegas, Nevada 89101  T: (702) 834-6166  paul@prhlawllc.com  charles@prhlawllc.com</p> <p>Amy B. Boyea (admitted pro hac vice)  Emily K. Felix (admitted pro hac vice)  MCDOWELL HETHERINGTON LLP  1000 Ballpark Way, Suite 209  Arlington, TX 76011  Telephone: (817) 635-7300  Facsimile: (817) 635-7308  E-mail: Amy.Boyea@mhllp.com  E-mail: Emily.Felix@mhllp.com</p> <p>Attorneys for Defendant AAA Life Insurance Company</p>
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**IT IS SO ORDERED.**

  
UNITED STATES DISTRICT JUDGE

DATED: September 18, 2024

## Laura Bolduc

---

**From:** Emily Felix <emily.felix@mhllp.com>  
**Sent:** Wednesday, September 18, 2024 8:18 AM  
**To:** Caitlin Lorelli; Justin Corne  
**Cc:** Amy Boyea; Laura Bolduc  
**Subject:** RE: Laing-Black v. AAA Life: Joint Pretrial Order

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Hi Caitlin,

We are agreeable to the SAO. I could make a call on October 1 work, or a day later the next week. So sorry to hear about your father.

Thanks,

**Emily K. Felix**

Associate

[McDowell Hetherington LLP](#)

P: 817-635-7305 F: 817-635-7308

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**From:** Caitlin Lorelli <Caitlin@injured.vegas>  
**Sent:** Wednesday, September 18, 2024 10:00 AM  
**To:** Emily Felix <emily.felix@mhllp.com>; Justin Corne <Justin@injured.vegas>  
**Cc:** Amy Boyea <amy.boyea@mhllp.com>; Laura Bolduc <laura@injured.vegas>  
**Subject:** Re: Laing-Black v. AAA Life: Joint Pretrial Order

Good morning,

Attached please find the proposed SAO to extend the deadline that I would like to submit to the Court this morning. Please confirm that you are in agreement and that we may use your e-signature.

In reviewing the calendar, do either October 1<sup>st</sup> or October 3<sup>rd</sup> work for you to discuss settlement and discuss the proposed joint pretrial order? In advance of the same I can provide the draft pretrial order for your additions.

Best,

Caitlin

*Caitlin J. Lorelli, Esq.*

**BROCK OHLSON**  
INJURY  LAWYERS  
WWW.INJURED.VEGAS

6060 Elton Avenue, Suite A

Las Vegas, Nevada 89107

office: 702.982.0055

fax: 702.982.0150

[Caitlin@injured.vegas](mailto:Caitlin@injured.vegas)

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**From:** Caitlin Lorelli <[Caitlin@injured.vegas](mailto:Caitlin@injured.vegas)>

**Sent:** Tuesday, September 17, 2024 5:15 PM

**To:** Emily Felix <[emily.felix@mhllp.com](mailto:emily.felix@mhllp.com)>; Justin Corne <[Justin@injured.vegas](mailto:Justin@injured.vegas)>

**Cc:** Amy Boyea <[amy.boyea@mhllp.com](mailto:amy.boyea@mhllp.com)>; Laura Bolduc <[laura@injured.vegas](mailto:laura@injured.vegas)>

**Subject:** RE: Laing-Black v. AAA Life: Joint Pretrial Order

Hi Emily,

We spoke with Nick, the JA, and he advised that if we needed additional time to file the Pretrial Order, the parties can file a stipulation.

In light of the upcoming trial our firm has and a 2.67 conference tomorrow, along with me being out of the office on Thursday and Friday for my dad's open-heart surgery, would you be amenable to stipulating to push this out? In conjunction with the stipulation we could set a date and time for the parties to discuss settlement and prepare the proposed joint pretrial order pursuant to LR 16-3.

Please let me know.

Best,  
Caitlin  
*Caitlin J. Lorelli, Esq.*

**BROCK OHLSON**  
INJURY  LAWYERS  
WWW.INJURED.VEGAS

6060 Elton Avenue, Suite A  
Las Vegas, Nevada 89107  
office: 702.982.0055  
fax: 702.982.0150

[Caitlin@injured.vegas](mailto:Caitlin@injured.vegas)

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**From:** Caitlin Lorelli <[Caitlin@injured.vegas](mailto:Caitlin@injured.vegas)>  
**Sent:** Tuesday, September 17, 2024 3:59 PM  
**To:** Emily Felix <[emily.felix@mhllp.com](mailto:emily.felix@mhllp.com)>; Justin Corne <[Justin@injured.vegas](mailto:Justin@injured.vegas)>  
**Cc:** Amy Boyea <[amy.boyea@mhllp.com](mailto:amy.boyea@mhllp.com)>; Laura Bolduc <[laura@injured.vegas](mailto:laura@injured.vegas)>  
**Subject:** RE: Laing-Black v. AAA Life: Joint Pretrial Order

Hi Emily,

Thank you for providing. We are preparing for trial in another matter but I will work on this now and circulate before we discuss over the phone.

Also please note that I have added my new paralegal Laura to this correspondence.

Best,  
Caitlin  
*Caitlin J. Lorelli, Esq.*

**BROCK OHLSON**  
INJURY  LAWYERS  
WWW.INJURED.VEGAS

6060 Elton Avenue, Suite A  
Las Vegas, Nevada 89107  
office: 702.982.0055  
fax: 702.982.0150

[Caitlin@injured.vegas](mailto:Caitlin@injured.vegas)

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**From:** Emily Felix <[emily.felix@mhllp.com](mailto:emily.felix@mhllp.com)>

**Sent:** Tuesday, September 17, 2024 10:06 AM

**To:** Justin Corne <[Justin@injured.vegas](mailto:Justin@injured.vegas)>; Caitlin Lorelli <[Caitlin@injured.vegas](mailto:Caitlin@injured.vegas)>

**Cc:** Amy Boyea <[amy.boyea@mhllp.com](mailto:amy.boyea@mhllp.com)>

**Subject:** RE: Laing-Black v. AAA Life: Joint Pretrial Order

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Hi Justin and Caitlin,

Following up on the below, please advise as I believe we need to confer according to LR 16-3(b) and submit a form of pretrial order in line with LR 16-4.

(b) Upon the initiative of a pro se plaintiff or plaintiff's attorney, the attorneys or parties who will try the case and who are authorized to make binding stipulations must personally discuss settlement and prepare and file a proposed joint pretrial order containing the following:

- (1) A concise statement of the nature of the action and the parties' contentions;
- (2) A statement of the basis for this court's jurisdiction with specific legal citations;
- (3) A statement of all uncontested facts deemed material in the action;
- (4) A statement of the contested issues of fact in the case as agreed upon by the parties;
- (5) A statement of the contested issues of law in the case as agreed upon by the parties;
- (6) Plaintiff's statement of any other issues of fact or law deemed to be material;
- (7) Defendant's statement of any other issues of fact or law deemed to be material;
- (8) Lists or schedules of all exhibits that will be offered in evidence by the parties at the trial. The lists or schedules must describe the exhibits sufficiently for ready identification and:
  - (A) Identify the exhibits the parties agree can be admitted at trial; and
  - (B) List those exhibits to which objection is made and state the grounds for the objection. Stipulations on admissibility, authenticity, and/or identification of documents should be made whenever possible;
- (9) A statement by each party of whether they intend to present evidence in electronic format to jurors for purposes of jury deliberations. Parties should consult the court's website or contact the assigned judge's courtroom administrator for instructions on how to prepare evidence in electronic format and other requirements;
- (10) A statement by each party identifying any depositions intended to be offered at the trial, except for impeachment purposes, and designating the portions of the deposition to be offered;
- (11) A statement of the objections, and the grounds for them, to deposition testimony the opposing party has designated;
- (12) A list of witnesses, with their addresses, who may be called at the trial. The list may not include witnesses whose identities were not, but should have been, revealed in response to permitted discovery unless the court, for good cause and on such conditions as are just, orders otherwise; and
- (13) A list of motions in limine filed, if any.

Thanks,

**Emily K. Felix**

Associate

McDowell Hetherington LLP

P: 817-635-7305 F: 817-635-7308

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**From:** Emily Felix

**Sent:** Wednesday, September 11, 2024 12:22 PM

**To:** Justin Corne <[Justin@injured.vegas](mailto:Justin@injured.vegas)>; Caitlin Lorelli <[Caitlin@injured.vegas](mailto:Caitlin@injured.vegas)>

**Cc:** Amy Boyea <[amy.boyea@mhllp.com](mailto:amy.boyea@mhllp.com)>

**Subject:** Laing-Black v. AAA Life: Joint Pretrial Order

Hi Justin and Caitlin,

Looking ahead to the September 18 deadline to submit the proposed joint pretrial order, will you be providing a draft for us to add AAA Life's inserts to?

Thank you,

**Emily K. Felix**

Associate

---

**MH** McDowell  
Hetherington LLP

1000 Ballpark Way, Suite 209

Arlington, TX 76011

P: 817-635-7305 F: 817-635-7308

[www.mhllp.com](http://www.mhllp.com)

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